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9 *Counsel for Navient Solutions, LLC*
10 *and Navient Credit Finance Corporation*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14
15 **IN RE: OSCAR D. TERAN, Debtor**

Bankruptcy No. 10-31718
Chapter 7

16
17 **— OSCAR D. TERAN, on behalf of himself**
18 **and all those similarly situated,**

19 **Plaintiffs,**

Adversary No. 20-03075

20 **v.**

**DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

21 **NAVIENT SOLUTIONS, LLC, NAVIENT**
22 **CREDIT FINANCE CORPORATION,**

23 **Defendants.**

Date: December 3, 2021
Time: 9:30 a.m.
Location: Telephonic Appearance
Courtroom 17
150 Golden Gate Avenue
16th Floor
San Francisco, CA 94102

1 Pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, as made applicable to this
2 proceeding by Rule 7056 of the Federal Rules of Bankruptcy Procedure, Defendants Navient
3 Solutions, LLC and Navient Credit Finance Corporation (together, “Defendants”), through this
4 Motion, respectfully move that this Court:

5 (a) Grant summary judgment in favor of Defendants;

6 (b) Enter a judgment that Plaintiff Oscar D. Teran’s (“Plaintiff”) Bar Study loan is
7 excepted from discharge absent a showing of undue hardship;

8 (c) Dismiss the remainder of Plaintiff’s complaint as moot; and

9 (d) Grant such other relief as is just and proper under the circumstances.

10 Respectfully submitted,

11 /s/ Payam Khodadadi

12 Dated: July 30, 2021

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20 *Counsel for Navient Solutions, LLC*
21 *and Navient Credit Finance Corporation*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on July 30, 2021, I electronically transmitted the foregoing document
3 entitled **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** to the Clerk's Office of the
4 United States Bankruptcy Court, Northern District of California, using the Court's CM/ECF System
5 for filing and service via transmittal of a Notice of Electronic Filing email from the Court to the
6 registered email addresses of the interested parties in this case.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

9 Executed on July 30, 2021 at Los Angeles, California.

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11 By: /s/ Payam Khodadadi
12 Payam Khodadadi
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